

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011

Date filed: 02/23/11

Name of company covered by this certification: NTCH, Inc. and Subsidiaries (see names below)

Form 499 Filer ID: 822590

Name of signatory: Glenn Ishihara

Title of signatory: President

I, Glenn Ishihara, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. See attached statement.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that the false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  _____

Subsidiaries:

NTCH-West Tenn, Inc.
WGH Communications Inc.
NTCH-WA Inc.

STATEMENT REGARDING OPERATING PROCEDURES

NTCH, Inc. ("NTCH") has established the following operating procedures for itself and its operating subsidiaries to ensure compliance with the FCC's CPNI rules:

1. All personnel having access to CPNI are trained to be aware that the information is to be treated as highly confidential and is not to be disclosed or divulged without express approval of NTCH's President or the General Manager or the operating subsidiary. Employees are instructed that unauthorized access to or disclosure of CPNI is grounds for immediate termination.
2. NTCH's policy requires maintaining a record, both electronically and in paper form, of any promotional campaigns using its customers' CPNI. These records must be maintained for at least one year. However, NTCH has not engaged in such a campaign. NTCH makes it a policy not to sell CPNI to any third parties, nor has CPNI been disclosed to third parties, except for permissible purposes such as preparing billing invoices for transmittal to customers, subject to strict confidentiality agreements.
3. Any outbound marketing efforts by sales personnel involving the use of CPNI must be approved in advance by the local General Manager or NTCH's President. No such outbound marketing efforts have been approved. If any such efforts are approved, they will be carefully supervised by the General Manager for compliance with the CPNI rules in advance and during the campaign, and records of the compliance status will be maintained for at least one year.
4. In addition to the foregoing, NTCH does not permit sales representatives access to customer credit/debit card information.